## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

Abdi Nazemian, et al.,

Plaintiffs,

vs.

NVIDIA Corporation,

Defendant.

Andre Dubus III, et al.,

Plaintiffs,

Case No. 4:24-cv-01454-JST (SK) Case No. 4:24-cv-02655-JST (SK)

FURTHER JOINT STIPULATION AND [PROPOSED] ORDER RE DEPOSITION PROTOCOL SUBMISSION DEADLINE

Defendant.

**NVIDIA** Corporation,

VS.

Case No. 4:24-cv-01454-JST (SK) Case No. 4:24-cv-02655-JST (SK)

FURTHER JOINT STIPULATION AND [PROPOSED] ORDER RE DEPOSITION PROTOCOL SUBMISSION DEADLINE

Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

- 1. WHEREAS, on March 21, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from March 25, 2025 to April 24, 2025, which was granted on March 25, 2025 (*Nazemian*, ECF Nos. 128, 130; *Dubus*, ECF Nos. 82, 84);
- 2. WHEREAS, the parties require additional time to confer regarding Plaintiffs' proposed deposition protocol and believe that a further extension of the Deposition Protocol deadline is needed so they can make progress toward a stipulated protocol; and
- 3. WHEREAS, the requested extension will not affect any other date scheduled in this case; NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties and their respective counsel, subject to the Court's approval, that the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be further extended from April 24, 2025 to May 15, 2025.

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	DEADLINE	

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FURTHER JOINT STIPULATION AND [PROPOSED] ORDER RE DEPOSITION PROTOCOL SUBMISSION DEADLINE

Dated: April 22, 2025 Respectfully submitted, 1 By: /s/ Bryan L. Clobes 2 Bryan L. Clobes (admitted pro hac vice) Alexander J. Sweatman (admitted pro hac vice) 3 Mohammed Rathur (admitted pro hac vice) 4 **CAFFERTY CLOBES MERIWETHER** & SPRENGEL LLP 5 135 South LaSalle Street, Suite 3210 Chicago, IL 60603 6 Tel: 312-782-4880 7 bclobes@caffertyclobes.com asweatman@caffertyclobes.com 8 mrathur@caffertyclobes.com 9 David A. Straite (admitted *pro hac vice*) DICELLO LEVITT LLP 10 485 Lexington Avenue, Suite 1001 New York, NY 10017 11 Tel. (646) 933-1000 12 dstraite@dicellolevitt.com 13 Amy E. Keller (admitted *pro hac vice*) Nada Djordjevic (admitted *pro hac vice*) 14 James A. Ulwick (admitted pro hac vice) 15 DICELLO LEVITT LLP Ten North Dearborn Street, Sixth Floor 16 Chicago, Illinois 60602 Tel. (312) 214-7900 17 akeller@dicellolevitt.com ndjordjevic@dicellolevitt.com 18 julwick@dicellolevitt.com 19 Brian O'Mara (SBN 229737) 20 DICELLO LEVITT LLP 4747 Executive Drive 21 San Diego, California 92121 Telephone: (619) 923-3939 22 Facsimile: (619) 923-4233 23 briano@dicellolevitt.com 24 Counsel for the Dubus Plaintiffs and Proposed Class 25 26 27 Case No. 4:24-cv-01454-JST (SK) 5 Case No. 4:24-cv-02655-JST (SK)

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[PROPOSED]	<b>ORDER</b>
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Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for
filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective
proposals shall be continued to May 15, 2025.

IT IS SO ORDERED.

Dated:	
	The Honorable Sallie Kim
	U.S. Magistrate Judge

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## ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: April 22, 2025 /s/ Sean S. Pak

Sean S. Pak

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